REMARKS

This is intended as a full and complete response to the Office Action dated March 28, 2007, having a shortened statutory period for response set to expire on June 28, 2007. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-4, 12-24 and 26-28 are pending in the application and remain pending following entry of this response. Applicants submit that the amendments presented herein do not introduce new matter.

Claim Rejections - 35 U.S.C. § 112

Claims 1 and 12 are rejected under 35 U.S.C. § 112 for antecedent basis issues. These claims have been amended to address these issues. Applicants respectfully request withdrawal of this rejection.

Claim Rejections - 35 U.S.C. § 102

Claims 12-20 stand rejected under 35 U.S.C. § 102( ) as being anticipated by *Gupta* (U.S. Patent 6,956,593). Applicants respectfully traverse this rejection.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

In this case, *Gupta* fails to teach "each and every element" as set forth in the claims. For example, *Gupta* fails to teach "receiving a request from one of the applications to create an annotation for a data object, *wherein the data object is*

identified by a set of identifying parameters" and "selecting an annotation structure from a set of annotation structures, each annotation structure defining one or more annotation fields, *wherein the selection is based, at least in part, on the set of identifying parameters identifying the data object to be annotated*" as recited in independent claims 12 and 18.

Gupta fails to mention any kind of parameters identifying a data object to be annotated that are sent with a request to create an annotation. Rather, as explained in column 13, lines 41-51, an assumption is made (because there is no identification) as to what is being annotated:

> Interface 152 assumes that the current media stream being presented to the user is the media stream to which the new annotation will be associated. The media stream to which an annotation is associated is referred to as the "target" of the annotation. An identifier of this stream is displayed in a target specification area 300 of dialog box 280. Alternatively, a user could change the target of the annotation, such as by typing in a new identifier in target area 300, or by selection of a "browse" button (not shown) that allows the user to browse through different directories of media streams

Clearly, if this assumption is made there is no identification provided.

The current claims also recite that an annotation structure is selected (at least in part) based no the identifying parameters, each annotation structure defining annotation fields. The Examiner refers different GUIs (in FIGs. 7-11 of *Gupta*) as teaching multiple annotation structures. Even if these were interpreted as teaching different annotation structures, there is no teaching that a corresponding structure is selected based on parameters identifying a data object being annotated. In contrast, the only teaching is Gupta is that the different GUIs present a different number of options to a user (e.g., with full options for advanced users), as described in column 14, lines 49-57.

For these reasons, Applicants submit claims 12 and 18, as well as their dependents, are allowable and withdrawal of this rejection is respectfully requested.

Claim Rejections - 35 U.S.C. § 103

Claims 1-4, 21-24 and 26-28 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Altman* (U.S. Publication 2004/0163042) in view of *ESP* (Electrical Schematics Page, April 25, 2002, http://www.jlab.org/accel/inLgroup/elec1.htm). Applicants respectfully traverse this rejection.

The Examiner bears the initial burden of establishing a *prima facie* case of obviousness. *See* MPEP § 2142. To establish a *primafacie* case of obviousness three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one ordinary skill in the art, to modify the reference or to combine the reference teachings. Second, there must be a reasonable expectation of success. Third, the prior art reference (or references when combined) must teach or suggest all the claim limitations. *See* MPEP § 2143.

The present rejection fails to establish at least the criterion. For example, even if combined as suggest in the Office Action, the cited references fail to teach "providing, via the annotation management system, one or more interfaces for manipulating annotations for the annotatable data objects, *a set of annotation structures each defining a set of annotation fields*, and an annotation server configured to receive requests to access annotations for one or more of the annotatable data objects issued by at least one of the plurality of applications on the network, *wherein the annotation server is further configured to generate, based on an annotation structure associated with the one or more annotatable data objects*, the one or more interfaces for creating or viewing annotations" as recited in independent claim 1.

In fact, *Altman* is silent as to any different types of interface depending on a type of data object being annotated. While the Examiner refers to Paragraphs 41 and 42 of Altman as teaching different annotation structures defining different fields, Applicants respectfully submit these paragraphs teach only that different types of fields might be recorded in a database to identify an object being annotated, but are not differenttypes of annotation fields and, certainly do not teach the use of different types of annotation

structures as claimed. When describing an interface for entering annotations, in paragraph 46, Altman simply teaches a text area may pop up, but does not teach the use of different fields, defined by distinct annotation structures, as claimed in independent claims 1 and 21.

The Examiner admits that *Altman* does not teach that annotatable data structures include an electrical or mechanical schematic. And while the Examiner relies on *ESP* as teaching this element, Applicants respectfully submit that while *ESP* does teach a listing of schematics, it is silent as to annotating those schematics and, certainly does not teach annotating schematics in the manner recited in the claims.

For these reasons, Applicants submit that independent claims 1 and 21, as well as their dependents, are allowable and respectfully request withdrawal of this rejection.

Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted, and
S-signed pursuant to 37 CFR 1.4,

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